

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) DOCKET NO. 3:17CR114-RJC
)
)
ROBERT M. BOSTON, et al,)
)
)
Defendants.)
)

NOTICE OF RELIANCE PURSUANT TO FED. R. EVID. 902

NOW COMES the United States of America, by and through Jill Westmoreland Rose, United States Attorney for the Western District of North Carolina, who hereby gives notice pursuant to Rule 902 of the Federal Rules of Evidence, that the United States may seek to admit some or all of the following documents, all of which have been previously provided to defendants, using the certifications identified below.

Certificate	Documents
USA-00000088 Aquesta Bank	As described in Certificate and produced in the range USA-00000089 to USA-00000954
USA-00880191 Aquesta Bank	As described in Certificate and produced in the range USA-00795107 to USA-00795188
USA-00000955 AT&T	As described in Certificate produced in the range USA-00000956 to USA-00001788
USA-00004337 Bank of America	As described in Certificate and produced in the range USA-00004338 to USA-00004878
USA-00004879 Bank of America	As described in Certificate and produced in the range USA-00004880 to USA-00006386
USA-00795189 Branch Banking and Trust (BB&T)	As described in Certificate and produced in the range USA-00795190 to USA-00796433

USA-00795256 Branch Banking and Trust (BB&T)	As described in Certificate and produced in the range USA-00795257 to USA-00795383
USA-00795384 Branch Banking and Trust (BB&T)	As described in Certificate and produced in the range USA-00795385 to USA-00796518
USA-00006797 Citibank, N.A.	As described in Certificate and produced in the range USA-00006798 to USA-00007001
USA-00880835 Community One Bank NA	As described in Certificate and produced in the ranges: USA-00007002 to USA-0007949 USA-00811206 to USA-00811998
USA-00007950 Community One Bank NA	As described in Certificate and produced in the range USA-00007951 to USA-00011519
USA-00011520 Community One Bank NA	As described in Certificate and produced in the range USA-00011521 to USA-00011534
USA-00011535 Community One Bank NA	As described in Certificate and produced in the range USA-00011536 to USA-00012368
USA-00073343 to USA-00073347 Federal Deposit Insurance Corporation	As described in Certificate and produced in the range USA-00073348
USA-00000001 Fence IT LLC& Bridge Properties Group, LLC	As described in Certificate and produced in the range USA-00000002 to USA-00000087
USA-00073323 First Citizens Bank	As described in Certificate and produced in the range USA-00073324 to USA-00073341
USA-00108816 Green Bank NA	As described in Certificate and produced in the range USA-00108817 to USA-00108895
USA-00880732 Harvard Business Services Inc.	As described in Certificate and produced in the range USA-00108896 to USA-00110385
USA-00880197 to USA-00880201 Internal Revenue Service	No corresponding documents. Certificate is a certification of lack of record
USA-00413453 MUFG Union Bank, N.A.	As described in Certificate and produced in the range USA-00413454 to USA-00413496
To be produced PayPal	As described in Certificate and produced in the range USA-00413454 to USA-00429677
USA-00429678 Peoples Bank	As described in Certificate and produced in the range USA-00429530 to USA-00429764

USA-00429926 PNC Bank, NA	As described in Certificate and produced in the range USA-00429927 to USA-00430038
USA-00432808 SRS Title Services	As described in Certificate and produced in the range USA-00432809 to USA-00432997
USA-00432998 SRS Title Services	As described in Certificate and produced in the range USA-00432999 to USA-00433187
USA-00433188 Thomas & Godley	As described in Certificate and produced in the range USA-00433189 to USA-00434627
USA-00434760 Total Title & Escrow	As described in Certificate and produced in the range USA-00434761 to USA-00435019
USA-00435020 Total Title & Escrow	As described in Certificate and produced in the range USA-00435021 to USA-00435279
USA-00880731 Trustco Bank	As described in Certificate and produced in the range USA-00434628 to USA-00434759
USA-00880748 Wells Fargo Bank, N.A.	As described in Certificate and produced in the range USA-00435531 to USA-00438317
USA-00438318 to USA-00438319 Wells Fargo Bank, N.A.	As described in Certificate and produced in the range USA-00438320 to USA-00438332
USA-00438333 Woodforest National Bank	As described in Certificate and produced in the range USA-00438334 to USA-00438417
USA-00880194 to USA-00880195 GoDaddy.com, LLC	As described in Certificate and produced in the ranges: USA-00073369 to USA-00108815; USA-00812138 to USA-00850546; and USA-00851456 to USA-00880190

Dated: November 20, 2017

JILL WESTMORELAND ROSE
UNITED STATES ATTORNEY

/s/ Daniel Ryan

Assistant United States Attorney
IL Bar Number: 6279737
United States Attorney's Office
227 West Trade Street, Ste. 1650
Charlotte, North Carolina 28202

Telephone: (704) 344-6222
Fax: (704) 344-6629
E-mail: daniel.ryan@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 2017, the foregoing was served upon the defendants herein through their attorneys of record via electronic filing.

Kevin Tate
W. Kelly Johnson
Caleb Newman
Assistant Federal Defenders
Suite 300
129 West Trade Street, Ste. 300
Charlotte, North Carolina 28202
Kevin_Tate@fd.org
W_Kelly_Johnson@fd.org
Caleb_Newman@fd.org

Counsel for Defendant Robert M. Boston

Sean P. Devereux
Deveruex & Banzhoff, PLLC
Suite 1100
The Jackson Building
Asheville, North Carolina 28801
sdevereux@dblawoffices.com

Counsel for Defendant Robert S. LaBarge

/s/ **Daniel Ryan**
Attorney for the United States